

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Marquita Kirk		
	Debtor(s)	CHAPTER 13
PENNYMAC LOAN SERVICES, LLC		
	Movant	
vs.		
Marquita Kirk		NO. 21-11771 MDC
	Debtor(s)	
Kenneth E. West Esq.		
	Trustee	11 U.S.C. Section 362

**MOTION OF PENNYMAC LOAN SERVICES, LLC
TO APPROVE PARTIAL CLAIM**

1. The Movant is PENNYMAC LOAN SERVICES, LLC.
2. Debtor(s) is/are the owner(s) of the premises 8435 Williams Avenue, Philadelphia, PA 19150, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$126,172.00 on the mortgaged premises that was executed on March 24, 2017. Said mortgage was recorded on March 28, 2017 at Document ID Number 53192380. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on December 2, 2021, at Document ID Number 53909780 in Philadelphia County.
4. Kenneth E. West Esq., is the Trustee appointed by the Court.
5. Debtor has applied and been approved for a Partial Claim Agreement with Movant. The Partial Claim is attached hereto as Exhibit "A".
6. Movant seeks Court approval of the Partial Claim by way of the within Motion.
7. Approval and recordation (if applicable) of the Partial Claim shall not constitute a violation of the automatic stay.
8. Upon Court approval of the within Motion, Movant shall file an Amended Proof of Claim to reflect the Partial Claim within thirty (30) days of the entry of any such Order.

WHEREFORE, Movant prays that an Order be entered approving the Partial Claim Agreement and allowing for the recordation of such agreement (if applicable).

/s/ Denise Carlon, Esquire
Denise Carlon, Esquire
Attorneys for Movant/Applicant
Main Phone #: 215-627-1322